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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRUCE MORGAN, an individual;
Plaintiff,

v.

LM GENERAL INSURANCE COMPANY;
and DOES I through X, inclusive; and ROE
CORPORATIONS I through V, inclusive,
Defendants.

CASE NO.: 2:24-CV-00329-RFB-EJY

**STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

COMES NOW, Plaintiff, BRUCE MORGAN (hereinafter "Plaintiff"), by and through his counsel of record, MATTHEW W. HOFFMANN, ESQ. of the law firm of ATKINSON WATKINS & HOFFMANN, LLP d/b/a BATTLE BORN INJURY LAWYERS, and Defendant, LM GENERAL INSURANCE COMPANY (hereinafter "Defendant"), by and through its counsel of record, RYAN L. DENNETT, ESQ. and MATTHEW J. WAGNER, ESQ., of the law firm of DENNETT WINSPEAR, LLP, and hereby stipulate and agree that this case be dismissed, with prejudice, and that each party bear its own attorneys' fees and/or costs.

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1 Entry of this Stipulation and Order will result in the dismissal of the entire action, with
2 prejudice, as to all Defendants.

3 DATED this 25th day of February, 2025. DATED this 25th day of February, 2025.

4 **ATKINSON WATKINS & HOFFMANN, LLP DENNETT WINSPEAR, LLP**
5 **d/b/a BATTLE BORN INJURY LAWYERS**

6 /s/ Matthew W. Hoffmann, Esq.

7 MATTHEW W. HOFFMANN, ESQ.
8 Nevada Bar No.:9061
9 10789 W. Twain Avenue, Ste. 100
10 Las Vegas, NV 89135
11 Attorney of Plaintiff,
12 *Bruce Morgan*

/s/ Matthew J. Wagner, Esq.

RYAN L. DENNETT, ESQ.
Nevada Bar No.: 5617
MATTHEW J. WAGNER, ESQ.
Nevada Bar No.: 11311
3301 N. Buffalo Drive, Ste. 195
Las Vegas, NV 89129
Attorney for Defendant,
LM General Insurance Company

Case Name: Bruce Morgan v. LM General Insurance Company, et al.
Case No.: 2:24-CV-00329-RFB-EJY

ORDER

Pursuant to the foregoing Stipulation, and good cause showing therefore:

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that the above-entitled action be, and the same is hereby dismissed with prejudice, all parties to bear their own attorneys' fees and costs.

DATED this 27 day of February, 2025.



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

From: [Matt Wagner](#)
To: [Lina Leiwalo](#); [Ryan Dennett](#)
Cc: [Matthew Hoffmann](#); [Nancy Ray](#); [Theresa Amendola](#)
Subject: RE: Morgan v. Liberty Mediation
Date: Tuesday, February 25, 2025 7:05:24 AM
Attachments: [image001.png](#)

You can affix my signature.

MATTHEW J. WAGNER, Esq.

DENNETT WINSPEAR

Direct Line/Text: (702) 781-2775

Main Office Line: (702) 839-1100

Mailing Address: 3301 N. Buffalo Drive, Suite 195, Las Vegas, NV 89129

From: Lina Leiwalo <Lina@awhlawyers.com>
Sent: Monday, February 24, 2025 5:07 PM
To: Matt Wagner <mwagner@dennettwinspear.com>; Ryan Dennett <rdennett@dennettwinspear.com>
Cc: Matthew Hoffmann <mhoffmann@awhlawyers.com>
Subject: RE: Morgan v. Liberty Mediation

Good evening Counsel:

Our office has received the settlement check for this one. Therefore, please see attached Stipulation of dismissal for your review. Please advise of any changes to be made, should there be no changes, please let me know if I have your permission to affix your electronic signature.

Thank you,

Lina L.

Paralegal

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From: Matt Wagner <mwagner@dennettwinspear.com>
Sent: Thursday, February 13, 2025 1:53 PM
To: Lina Leiwalo <Lina@awhlawyers.com>
Cc: Matthew Hoffmann <mhoffmann@awhlawyers.com>
Subject: RE: Morgan v. Liberty Mediation

Received. I was told the check had been issued, so it should arrive any day.

MATTHEW J. WAGNER, Esq.
DENNETT WINSPEAR
Direct Line/Text: (702) 781-2775
Main Office Line: (702) 839-1100
Mailing Address: 3301 N. Buffalo Drive, Suite 195, Las Vegas, NV 89129

From: Lina Leiwalo <Lina@awhlawyers.com>
Sent: Thursday, February 13, 2025 12:26 PM
To: Matt Wagner <mwagner@dennettwinspear.com>
Cc: Matthew Hoffmann <mhoffmann@awhlawyers.com>
Subject: RE: Morgan v. Liberty Mediation

Good afternoon Mr. Wagner,

Please see attached executed Settlement Release and CMS Form for your records.

Should you have any questions and/or concerns, please do not hesitate to contact our office.

Thank you,

Lina L.
Paralegal

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From: Matt Wagner <mwagner@dennettwinspear.com>
Date: Tuesday, February 4, 2025 at 11:57 AM
To: J. Keating <jkeating@keatinglg.com>, Matthew Hoffmann
<mhoffmann@awhlawyers.com>
Cc: Amy Ebinger <aebinger@keatinglg.com>
Subject: RE: Morgan v. Liberty Mediation

John and Matt,

I just talked with Liberty Mutual claims and they gave the okay to settle this for \$180,000. John, thanks again for your help working this out with the parties yesterday. Matt, thanks to you and Mr. Morgan for your cooperation in getting this done.

Matt, I've attached a release, Medicare affidavit, and Optum lien notice for Mr. Morgan. I know releases aren't generally needed for UIM claims, but I'm attaching it because I said I would. If you're able to return it signed, great. If your office could at least send the Medicare confirmation back, that would be helpful. I know we have a W9 for you, but if you could let me know the specific payment instructions, I'll get those over to the carrier asap so they can issue the check. Let me know if you have any questions.

MATTHEW J. WAGNER, Esq.

DENNETT WINSPEAR

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Mailing Address: 3301 N. Buffalo Drive, Suite 195, Las Vegas, NV 89129

From: J. Keating <jkeating@keatinglg.com>
Sent: Monday, February 3, 2025 4:49 PM
To: Matt Wagner <mwagner@dennettwinspear.com>; mhoffman@awhlawyers.com
Cc: Amy Ebinger <aebinger@keatinglg.com>
Subject: Morgan v. Liberty Mediation

Dear Counsel,

Thank you for your efforts today at mediation. While we were unable to resolve the case today, this will confirm that plaintiff counsel is willing to resolve the case in the amount of \$180,000 and that this offer will remain open until close of business on 2/10/25.

Matt Wagner—please let me know once you hear back from Liberty. Have a good evening everyone.

John Keating
Keating Law Group
9130 W. Russell Road Suite 200

Las Vegas, Nevada 89148

jkeating@keatinglg.com